



**TOKAI CARBON CB**

Building a Future of Technology and Trust

301 Commerce Street, Suite 500  
Fort Worth, TX 76102

Long B. Nguyen  
Director, Process Safety & Environmental Programs

June 27, 2022

Director, Air Enforcement Division  
U.S. Environmental Protection Agency  
MC 2242A  
1200 Pennsylvania Ave. NW Washington,  
D.C. 20460

Director  
Compliance Assurance and Enforcement Division  
U.S. Environmental Protection Agency, Region 6  
1201 Elm Street  
Dallas, TX 75270

Director of Litigation  
Litigation Division  
MC-175  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Division Chief  
Environmental Protection Division  
MC-066  
Office of the Attorney General of Texas  
P.O. Box 12548  
Austin, TX 78711-2548

Chief, Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
Box 7611 Ben Franklin Station  
Washington, D.C. 20044-7611

**Re: Malfunction Event Notice  
Tokai Carbon CB Borger Plant**

Dear Sir/Madame:

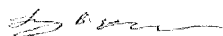
Per Provision 54 of the Consent Decree, Tokai Carbon CB ("Tokai") hereby provides notice that the Borger Plant Wet Gas Acid ("WSA") scrubber had elevated SO<sub>2</sub> and NO<sub>x</sub> emissions relative to their most stringent 7-day limits, for the period of May 26 through June 26, 2022. (Please see attached CEMS data.)

We are continuing to trouble-shoot the process with the vendors to determine why the WSA scrubber is not performing at an optimum level. As stated in the previous notice, Tokai has tentative plans to shut down the WSA scrubber, starting on August 14, 2022, for a thorough inspection of the equipment. Issues found during the inspection will be addressed before the WSA scrubber comes back online.

As we have requested in the past, we would like to implement the alternative limits that are outlined in Provision 18 (Option B and Appendix E) and Provision 27.b.ii. These provisions allow for the collection of emissions data for a certain period, and alternative limits can be set based on the data collected.

Please let me know if you need additional information.

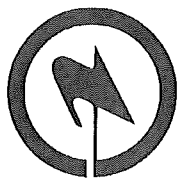
Sincerely,

A handwritten signature in black ink, appearing to read 'Long B. Nguyen', with a stylized flourish at the end.

Long B. Nguyen

**NOX 7-Day ppmvdc Excess Emission Report**  
**Boiler (EPN-119)**

**From:** 05/26/2022 00:00 **To:** 06/27/2022 05:51 **Facility Name:** Tokai Borger Facility  
**Generated:** 06/27/2022 07:08 **Location:** Borger, TX



**Tag Name:** U1\_NOX\_7D\_Ppmvdc\_1d

**Total Operating Time:** 32.00 Day(s)

**No Exclusions Allowed**

**Non-Operating Time:** 1.00 Day(s) **Report Time:** 33.00 Day(s)

Inc No	Start Time	End Time	Duration in Day(s)	Average	Limit	Maximum	Reason Code	Action Code
1	05/26/22 00:00	06/03/22 23:59	9	69	54	98		
2	06/14/22 00:00	06/26/22 23:59	13	66	54	69		

**Total Operating Time:**

**Total Duration (Online only):**

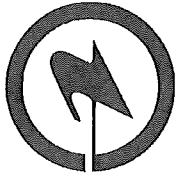
**Time in Exceedance as a percentage of operating time:**

**Time in compliance as a percentage of operating time:**

32.00 Day(s)  
22.00 Day(s)  
68.75 %  
31.25 %

**SO2 7-Day ppmvdc Excess Emission Report**  
**Boiler (EPN-119)**

**From:** 05/26/2022 00:00 **To:** 06/27/2022 05:51 **Facility Name:** Tokai Borger Facility  
**Generated:** 06/27/2022 07:09 **Location:** Borger, TX



**Tag Name:** U1\_SO2\_7D\_Ppmvdc\_1D

**Total Operating Time:** 32.00 Day(s)

**No Exclusions Allowed**

**Non-Operating Time:** 1.00 Day(s) **Report Time:** 33.00 Day(s)

Inc No	Start Time	End Time	Duration in Day(s)	Average	Limit	Maximum	Reason Code	Action Code
1	05/26/22 00:00	06/05/22 23:59	11	133	120	145		
2	06/14/22 00:00	06/26/22 23:59	13	141	120	148		

**Total Operating Time:** 32.00 Day(s)  
**Total Duration (Online only):** 24.00 Day(s)  
**Time in exceedance as a percentage of operating time:** 75.00 %  
**Time in compliance as a percentage of operating time:** 25.00 %